

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK
BUFFALO DIVISION

Swissdigital USA Co., Ltd.,

Plaintiff,

v.

Avon Lifestyle Pvt. Ltd. and

Naina Parekh,

Defendants.

JURY TRIAL DEMANDED

Case No.: 1:20-cv-870

DECLARATION OF ZHIJIAN “HUNTER” LI

I, Zhijian “Hunter” Li, declare as follows:

1. I am over twenty-one years of age and have personal knowledge of the facts set forth in this declaration.

2. I am the owner of Swissdigital USA Co., Ltd. (“Swissdigital”).

3. I submit this declaration in support of Swissdigital’s Response to the Court’s Order to Show Cause.

4. Attached hereto as Exhibit A is a true and correct copy of email correspondence between myself, Sanjay Parekh (“Mr. Parekh”), and counsel for Swissdigital from July 8, 2020 (Eastern Daylight Time). Mr. Parekh used the email address “sanjay@avongroup.in” and carbon copied Naina Parekh, using the email address “naina@avongroup.in,” and Pranay Parekh, using the email address “pranay@avongroup.in.”



5. Attached hereto as Exhibit B are true and correct screenshots of messages between myself and Mr. Parekh using the WeChat app from the period of July 9, 2020, through July 16, 2020.

6. Attached hereto as Exhibit C is a true and correct copy of email correspondence between myself, Mr. Parekh, and counsel for Swissdigital from July 9, 2020.

7. On July 11, 2020, I spoke over the phone with Mr. Parekh. During our conversation, I informed Mr. Parekh of the pendency of this lawsuit, discussed reaching a settlement, and notified Mr. Parekh that I would email him a copy of the Complaint (Dkt. 1).

8. On July 16, 2020, I spoke over the phone again with Mr. Parekh and discussed the pendency of this lawsuit. Mr. Parekh proposed a revised settlement and licensing agreement, seeking less money than his original July 8, 2020, proposal. I rejected Mr. Parekh's proposal.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on July 17th, 2022.

A handwritten signature in black ink, appearing to read 'Zhijian Li', is written above a horizontal line.

Zhijian "Hunter" Li